

IN THE DISTRICT COURT OF OKMULGEE COUNTY  
STATE OF OKLAHOMA

**FILED**  
IN DISTRICT COURT  
JUL - 6 2020  
OKMULGEE COUNTY, OKLAHOMA  
By: CHARLY CRINER, Court Clerk  
Deputy

CORDERO DEAN,

Plaintiff,

v.

WAL-MART STORES EAST, LP, a  
Foreign Limited Partnership, and  
JANE DOE,

Defendant.

Case No.

**CJ-2020-086**

Judge:

**ATTORNEYS LIEN CLAIMED  
JURY TRIAL DEMANDED**

**COMES NOW**, Plaintiff Cordero Dean, by and through his attorneys of record, Ashley H. Leavitt of Post Oak Law, PC and Daniel Aizenman of the Aizenman Law Group, and for his claims for relief against Defendants, does hereby state and allege as follows:

1. Plaintiff Cordero Dean is a resident of Tulsa County, State of Oklahoma, and was at the time of the incident which gave rise to the claims for relief set forth herein.
2. Defendant Wal-Mart Stores East, LP ("Wal-Mart") is a company doing business in the City of Okmulgee, State of Oklahoma, and was at all times relevant herein;
3. Defendant Jane Doe No. 1 ("Doe Defendant")'s residence is unknown.
4. The injuries that are the subject of this action occurred in Okmulgee County, Oklahoma.
5. This Court has jurisdiction over the matter and Venue is proper in Okmulgee County, Oklahoma.
6. On or about July 15, 2015, Plaintiff was a business invitee of Okmulgee Walmart Supercenter located at 1800 S. Wood Drive, Okmulgee, Oklahoma.

EXHIBIT

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suffered permanent disfigurement, and incurred expenses for medical attention for said injuries, with general and special damages totaling a sum in excess of \$75,000.00.

**WHEREFORE**, premises considered, Plaintiff prays for judgment against the Defendant Jane Doe No. 1 in an amount in excess of \$75,000.00 as and for general and special damages, plus court costs, prejudgment interest, post-judgment interest, and what other further relief this Court deems just and equitable.

**· SECOND CAUSE OF ACTION ·**  
**(Wal-Mart: Negligence/Respondeat Superior)**

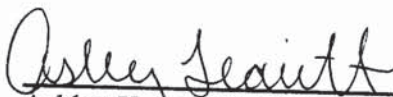
16. Plaintiff re-pleads the allegations contained in paragraphs 1 through 11 and paragraphs 13 through 15 as though set forth herein;

17. At all times relevant to this action Doe Defendant was acting within the course and scope of her employment with Wal-Mart.

18. Wal-Mart is liable for Doe Defendant's acts under the doctrine of *respondeat superior*.

**WHEREFORE**, premises considered, Plaintiff prays for judgment against the Defendant Wal-Mart in an amount in excess of \$75,000.00 as and for general and special damages, plus court costs, prejudgment interest, post-judgment interest, and what other further relief this Court deems just and equitable.

Respectfully Submitted,



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*And*

/s Daniel N. Aizenman

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